

EXHIBIT B

Scott Kim

From: Sam Hirzel <shirzel@hegh.law>
Sent: Wednesday, June 12, 2024 5:06 AM
To: Brian Farnan; Emily A. Letcher; Scott M. Ratchick; Guin, John C.
Cc: Scott Kim; Michael J. Farnan
Subject: Re: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

[EXTERNAL EMAIL]

Brian: I'll be in a deposition today, but feel free to take it up with Scott. Mr. Gao has not been served. He was not an officer or director so he could not have been served though the registered agent. And we have ring camera footage that demonstrates that the Weldon affidavit of personal service is false.

Samuel T. Hirzel
HEYMAN ENERIO GATTUSO & HIRZEL LLP
300 Delaware Ave., Suite 200
Wilmington, DE 19801
(302) 472-7315
shirzel@hegh.law

From: Brian Farnan <bfarnan@farnanlaw.com>
Date: Wednesday, June 12, 2024 at 12:38 AM
To: Sam Hirzel <shirzel@hegh.law>, Emily A. Letcher <ELetcher@hegh.law>, Scott M. Ratchick <Scott.Ratchick@CHAMBERLAINLAW.COM>, Guin, John C. <John.Guin@chamberlainlaw.com>
Cc: Scott Kim <skim@rosenlegal.com>, Michael J. Farnan <mfarnan@farnanlaw.com>
Subject: RE: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

Hi Sam,

Following-up on the below. Would you please let us now your position by the end of the day today? Also, let us know if you intend to respond to the Complaint. We intend to move for a default this week if we don't hear back.

Brian

From: Brian Farnan
Sent: Thursday, June 6, 2024 1:59 PM
To: 'Sam Hirzel' <shirzel@hegh.law>; 'Emily A. Letcher' <ELetcher@hegh.law>; 'Scott M. Ratchick' <Scott.Ratchick@CHAMBERLAINLAW.COM>; 'Guin, John C.' <John.Guin@chamberlainlaw.com>
Cc: 'Scott Kim' <skim@rosenlegal.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Subject: RE: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

Here is an additional proof of service.

Thanks

From: Brian Farnan
Sent: Thursday, June 6, 2024 1:54 PM
To: 'Sam Hirzel' <shirzel@hegh.law>; Emily A. Letcher <ELetcher@hegh.law>; Scott M. Ratchick <Scott.Ratchick@CHAMBERLAINLAW.COM>; Guin, John C. <John.Guin@chamberlainlaw.com>
Cc: Scott Kim <skim@rosenlegal.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Subject: RE: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

Here is the proof of service that was filed with the Court.

Would you please let us know your position on the amended complaint?

Thanks

From: Sam Hirzel <shirzel@hegh.law>
Sent: Thursday, June 6, 2024 1:51 PM
To: Brian Farnan <bfarnan@farnanlaw.com>; Emily A. Letcher <ELetcher@hegh.law>; Scott M. Ratchick <Scott.Ratchick@CHAMBERLAINLAW.COM>; Guin, John C. <John.Guin@chamberlainlaw.com>
Cc: Scott Kim <skim@rosenlegal.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Subject: Re: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

Can you send me evidence of effective service? My recollection was that there was never effective service and that Scott had raised that with Joe Christensen last year.

From: Brian Farnan <bfarnan@farnanlaw.com>
Date: Thursday, June 6, 2024 at 1:45 PM
To: Sam Hirzel <shirzel@hegh.law>, Emily A. Letcher <ELetcher@hegh.law>, Scott M. Ratchick <Scott.Ratchick@CHAMBERLAINLAW.COM>, Guin, John C. <John.Guin@chamberlainlaw.com>
Cc: Scott Kim <skim@rosenlegal.com>, Michael J. Farnan <mfarnan@farnanlaw.com>
Subject: RE: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

You don't often get email from bfarnan@farnanlaw.com. [Learn why this is important](#)

Yes, thanks

From: Sam Hirzel <shirzel@hegh.law>
Sent: Thursday, June 6, 2024 12:51 PM
To: Brian Farnan <bfarnan@farnanlaw.com>; Emily A. Letcher <ELetcher@hegh.law>; Scott M. Ratchick <scott.ratchick@chamberlainlaw.com>; Guin, John C. <John.Guin@chamberlainlaw.com>
Cc: Scott Kim <skim@rosenlegal.com>; Michael J. Farnan <mfarnan@farnanlaw.com>
Subject: Re: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

Adding co-counsel.

Has he been served?

From: Brian Farnan <bfarnan@farnanlaw.com>
Date: Thursday, June 6, 2024 at 11:58 AM
To: Sam Hirzel <shirzel@hegh.law>, Emily A. Letcher <ELetcher@hegh.law>

Cc: Scott Kim <skim@rosenlegal.com>, Michael J. Farnan <mfarnan@farnanlaw.com>

Subject: Pelham v. VBIT Technologies Corp. et al (23-cv-00162-CFC-SRF)

Some people who received this message don't often get email from bfarnan@farnanlaw.com. [Learn why this is important](#)

We noticed Jin Gao has not responded to the Complaint. Would you please let us know if he intends to respond?

Also, we intend to file the attached amended complaint (redline version attached). Would you please let us know if Jin Gao consents to the filing?

Please let us know about both issues today if possible.

Thanks

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